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8 Attorney for Defendant – ADAM JOHNSEN
9

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9 * * *

10 UNITED STATES OF AMERICA,) **2:22-mj-00261-BNW**
11)
12)
13 Plaintiff,) **STIPULATION AND ORDER**
14)
15 v.)
16 ADAM JOHNSEN,)
17)
18 Defendant.)
19)
20)

17 **STIPULATION AND ORDER TO AMEND CHARGE TO**
18 **RECKLESS DRIVING AND CLOSE CASE**
19

20 IT IS HEREBY STIPULATED AND AGREED by and between ADAM M. VANDER
21 HEYDEN, ESQ. Counsel for Defendant ADAM JOHNSEN and UNITED STATES
22 ATTORNEY'S OFFICE, that the original charge the Defendant plead to (Operating a Motor
23 Vehicle while Under the Influence of Alcohol), be amended to a Reckless Driving charge, which
24 the Defendant will enter a plea of guilty to, and the case subsequently closed, as all requirements
25 have been completed. The parties hereby move the court:

26 This Stipulation is entered into for the following reasons:

- 27 1. The Defendant has successfully completed all terms of the plea agreement.
28

1 2. According to the terms of the plea agreement, the original charge the Defendant
2 plead to (Operating a Motor Vehicle Under the Influence of Alcohol), is to be
3 amended to a Reckless Driving, which the Defendant will enter a plea of guilty to,
4 and the case subsequently closed.
5

6
7 DATED: March 6, 2023,
8

9 *Adam Vander Heyden*

10 ADAM M. VANDER HEYDEN, ESQ.
11 6590 S. Rainbow Blvd. – Suite #110
12 Las Vegas, Nevada 89118
13 Attorney for Defendant

Chris Burton

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
12 * * *

13 UNITED STATES OF AMERICA,) **2:22-mj-00261-BNW**
14)
15)
16 Plaintiff,) **ORDER**
17)
18 v.)
19)
20 ADAM JOHNSEN,)
21)
22 Defendant.)
23)
24)
25)
26)
27)
28)

29 **FINDINGS OF FACT**

30 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
31 parties move the court:

32 This Stipulation is entered into for the following reasons:

- 33 1. Mr. Johnsen has successfully completed all terms of the plea agreement.
- 34 2. According to the terms of the plea agreement, the original charge Mr. Johnsen plead
35 to (Operating a Motor Vehicle Under the Influence of Alcohol), is to be amended to
36 a Reckless Driving charge, and the case subsequently closed.

ORDER

IT IS HEREBY ORDERED that the parties move the court in above-referenced matter to be amended from Operating a Motor Vehicle Under the Influence of Alcohol to a Reckless Driving charge, and the case subsequently closed, as all requirements have been completed.

DATED this 28th day of March, 2023.



MAGISTRATE JUDGE